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May 6, 2025

U.S.D.J. Brian M. Cogan
United States District Court
for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Weberman v. Collado
Kings County
Ind. No. 916/2015
20-cv-03584-BMC

Your Honor:

I am writing to request a three-week extension to and including June 27, 2025, from the June 6, 2025 filing deadline for respondent's submission of a chart listing counts 3-87 of the indictment and the corresponding citations to the victim's state trial testimony supporting those indictment charges in the above-captioned case, which was requested by this Court's April 21, 2025 Order. I need this extension because I have been actively engaged in a three-week multi-witness hearing on a state defendant's motion to vacate his judgment of conviction of second-degree burglary as a sexually-motivated felony, attempted first-degree rape, and other crimes in the case of People v. Rashan Hay, Kings County Indictment Number 9123/2104. This state motion raises numerous claims of state and federal constitutional violations. The state court judge (Cyrulnick, J.) has ordered me to file a post-hearing brief on June 6, 2025, the same day that your Honor has ordered my submission of the chart to assist in determining the merits of petitioner's "as applied duplicity" argument. Judge Cyrulnick has ordered a prompt briefing schedule because she intends to write her decision on this state motion before her projected retirement at the end of June.

I am requesting an extension of the due date in your Honor's April 21, 2025 Order so that I have time both to obtain and review the necessary documents, some of which are in storage, and to adequately respond to your Honor's order. Petitioner's counsel, Donna Aldea, has consented to my extension request. Thank you for your consideration of my request for a three-week extension of my filing deadline to and including June 27, 2025.

Sincerely,

Anthea H. Bruffee
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